

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

NORMA SHAPIRO, individually and in her
capacity as Trustee for the Norma Shapiro
Revocable Declaration of Trust Under Agreement
Dated 9/16/2008 and the Trust Under Will of Philip
L. Shapiro; NORMA SHAPIRO DECLARATION
OF TRUST UNDER AGREEMENT DATED
9/16/2008, REVOCABLE TRUST; TRUST
UNDER WILL OF PHILIP SHAPIRO; and
MARTIN ROSEN, in his capacity as Trustee of the
Trust Under Will of Philip L. Shapiro,

Defendants.

Adv. Pro. No. 10-04486 (SMB)

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including January 20, 2017.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated: October 13, 2016
New York, New York

/s/ Nicholas J. Cremona
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, NY 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com
Dean D. Hunt
Email: dhunt@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

/s/ Carole Neville

DENTONS US LLP

1221 Avenue of the Americas

New York, NY 10020

Telephone: (212) 768-6700

Facsimile: (212) 768-6800

Carole Neville

Email: carole.neville@dentons.com

Attorneys for Defendants

/s/ Deborah A. Reperowitz

McGlinchey Stafford

112 W 34th Street, Suite 1403

New York, NY 10120

Telephone: (646) 362-4057

Facsimile: (646) 219-2145

Deborah A. Reperowitz

Email: dreperowitz@mcglinchey.com

Mediator